

EXHIBIT C

Thomas Chen

Boston, MA

December 14, 2005

1

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
MDL DOCKET NO. 01CV12257-PBS

CERTIFIED COPY

IN RE: PHARMACEUTICAL
INDUSTRY AVERAGE WHOLESALE
PRICE LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

VIDEOTAPED DEPOSITION of THOMAS CHEN, a witness
called on behalf of the Plaintiffs pursuant to the
Federal Rules of Civil Procedure, before Judith
McGovern Williams, Certified Shorthand Reporter,
Registered Professional Reporter, Certified Realtime
Reporter, and Notary Public in and for the
Commonwealth of Massachusetts, at the offices of
Foley Hoag, 155 Seaport Boulevard, Boston,
Massachusetts 02210, on Wednesday, December 14,
2005, commencing at 1:23 p.m.

Henderson Legal Services
(202) 220-4158

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146

1 manager, did Zeneca ever engage in the provision
2 of grants connected to purchase of Zoladex?

3 MS. HARRIS: You already asked him that
4 question and he already answered it.

5 A. No.

6 Q. No?

7 A. Not to my knowledge.

8 Q. And did Zeneca ever provide free samples
9 to physicians and encourage them to seek
10 reimbursement for them?

11 A. Not to my knowledge.

12 MR. SIEVERT: Okay. Can we just take a
13 short break?

14 THE WITNESS: Sure.

15 MS. HARRIS: Sure.

16 THE VIDEOGRAPHER: The time is 4:50.
17 We're off the record.

18 (Recess taken at 4:50 p.m.)

19 (Recess ended at 4:56 p.m.)

20 THE VIDEOGRAPHER: The time is 4:57.
21 We're on the record.

22 (One-page e-mail dated April 4, 1996, to

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